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AWWSP Team Office

June 1, 2004

Ms. Allison Ray
AWV Project Office (Wells Fargo Building)
999 Third Avenue, Suite 2424
Seattle, WA 98104

**Subject: SR 99: Alaskan Way Viaduct & Seawall Replacement Project DEIS
Comments from the Seattle Manufacturing Industrial Council**

Dear Ms. Ray:

We have reviewed the Draft Environmental Impact Statement prepared for the SR 99: Alaskan Way Viaduct & Seawall Replacement Project with respect to how it could affect the industrial areas of Seattle. The Manufacturing Industrial Council of Seattle (MIC) represents businesses in the Duwamish and Ballard Interbay Industrial (BINMIC) areas of Seattle. The "lifeline" linking these two areas is the Alaskan Way Viaduct.

We appreciate the efforts of WSDOT and City of Seattle staff to understand the issues affecting our constituents. Staff from both agencies have attended many MIC meetings and workshops. We trust that we will have continued opportunities to discuss detailed issues with the design team as a preferred alternative progresses into the next phase of design and construction planning.

Our comments regarding the project are detailed below. The MIC's comments primarily relate to our preferences and major design issues.

Regional Mobility

C-010-001

1. **The MIC strongly supports replacing the Alaskan Way Viaduct with a facility that, at a minimum, retains the existing regional traffic and freight mobility functions.** The Alaskan Way Viaduct is critical to continued economic success of both the Duwamish and BINMIC industrial areas. If it were to fail or be replaced with a facility that has less capacity, it would remove the primary freight link connecting these two areas. Total loss of capacity would also force tens of thousands of vehicles onto Interstate 5 and other surface streets through out Seattle, choking the ability to move freight into, out of, and through Seattle. Total loss of the facility could also significantly hamper freight rail movements to and through Seattle. The MIC supports alternatives that at least retain the existing capacity of the facility.
2. **The MIC does not support either the Surface or Bypass Tunnel Alternatives because they would reduce capacity of the corridor and impede access to Ballard/Interbay.** The DEIS shows that both of these alternatives would result in a loss of capacity, additional travel delay, and congestion particularly for trips destined to and from the BINMIC. These conditions are not acceptable to the MIC.
3. **Multiple routes for over-dimension cargo must be retained through Seattle.** Surface Alaskan Way is the major north-south route for over-dimension cargo in Seattle. However, other over-dimension routes are also critical and cannot be affected by the Viaduct project. These include Westlake Avenue, which is a primary over-dimension route to access Fremont and the South Lake Union area.

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C-010-001

The preferred Bored Tunnel Alternative meets the project's purpose and provides sufficient capacity in the SR 99 Corridor. The Surface and Bypass Tunnel Alternatives have been dropped from consideration because they did not meet the project's purpose. Both alternatives would have caused substantial increases in travel times and congestion.

C-010-002

No changes are proposed for Westlake Avenue as part of the Project. FHWA, WSDOT, and the City of Seattle are committed to working with the freight community to develop alternative freight routes and strategies to address freight concerns during the construction period.

Coordination with the City of Seattle Department of Transportation to review freight route adjustments, including accommodations for over-legal vehicles, is ongoing. Currently, the City allows access through the Seattle Center City, provided that operators of over-legal trucks obtain a permit and operate their trucks only during times allowed for in the permit. As the project progresses, outreach to the freight community will occur to address the needs of over-legal trucks either as part of the preferred Bored Tunnel Alternative or on surface Alaskan Way after construction. Analysis results addressing impacts to freight are provided in Appendix C, Transportation Discipline Report, of the Final EIS.

C-010-003

4. **The Viaduct should be considered as part of a regional system connecting to Interstate 5 at the south via SR 509.** The MIC is an ardent supporter of the SR 509 extension project because it provides additional north-south capacity between the Duwamish area and the Kent Valley. The Viaduct continues this access connection to the BINMIC area. It is along this spine that the vast majority of the entire Pacific Northwest's industrial businesses are located. The need for and benefits of this entire corridor, including the SR 509 extension, should be discussed in the FEIS.

Access for Ballard/Interbay

C-010-004

5. **The Western and Elliott Avenue ramps must be included in the preferred alternative.** These ramps provide the primary connection between BINMIC and the Viaduct corridor. If they are not included, all traffic destined to Ballard and Interbay would have to use surface Alaskan Way, which is not acceptable.

The design of the new ramps at Western and Elliott Avenues should improve on the conditions that exist today. Specifically, treatments that reduce the conflicts between truck traffic and pedestrian crossings at the head of each ramp should be included. Increased capacity for the southbound on-ramp traffic should also be evaluated to reduce the queuing that now occurs on southbound Elliott Avenue. If possible, pedestrian movements could be relocated to pass under the ramp to completely eliminate the conflict. Alternatively, the design could consider a dual right turn onto the ramp merging to one lane after the pedestrian crossing.

C-010-005

6. **The Preferred Alternative should be designed to retain the Broad Street underpass in the Mercer Corridor improvements.** According to the City of Seattle's *Mercer Corridor Project March Newsletter*, both of the two alternatives being considered for the Mercer Corridor retain the Broad Street underpass. Loss of this underpass could cause severe congestion and delay for traffic traveling from Interstate 5 to the Elliott Avenue corridor and on to BINMIC. Broad Street is part of the major east-west truck corridor and one of the only routes that allows trucks to bypass the Seattle Center. The Preferred Alternative should retain this important facility.

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7. **The FEIS should define alternate routes for flammable and hazardous materials transport, if either the Tunnel or Bypass Tunnel Alternatives are selected.** The DEIS states that flammable and hazardous (including combustible) materials are and would continue to be prohibited in the Battery Street Tunnel for all alternatives. It also states that, for the Tunnel and Bypass-Tunnel Alternatives, flammable and hazardous materials could be prohibited in tunnel sections. Since flammable materials are currently permitted on the existing viaduct and since hazardous materials are permitted during off-peak hour, the FEIS should provide analysis and discussion about alternative routes for and impacts of removing these trips. Alternative routes should be designated and where necessary, appropriate mitigation (such as signage and turn radii improvements) should be identified.

Access for Duwamish Industrial Area

C-010-007

8. **The MIC supports alternatives that provide new ramps/access at SR 519.** Providing access to SR 519 will not only improve freight mobility to the northern section of the Duwamish, it will also reduce traffic on other key north-south arterials in the Duwamish such as 1st and 4th Avenues S.
9. **The Preferred Alternative should allow for increased capacity on SR 519.** The Preferred Alternative for the Alaskan Way Viaduct should not preclude the ability to increase east-west capacity in the SR 519 corridor between the waterfront and Interstate 5/Interstate 90. Analysis in the DEIS shows that concentrating east-west travel into just the Atlantic Street corridor would cause the intersection of Atlantic

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Thank you for your comment. The project recognizes the importance of SR 99 to the regional transportation system.

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The project has evolved since 2004, please refer to the Final EIS for updated information. The preferred Bored Tunnel Alternative would remove the Elliott and Western ramps. The connection between Alaskan Way and Elliott and Western Avenues would be constructed as a separate independent project associated with the Bored Tunnel Alternative. The Cut-and-Cover Tunnel and Elevated Structure Alternatives would provide a functionally similar connection with SR 99 ramps at Elliott and Western Avenues, similar to the existing viaduct structure.

C-010-005

Under all three build alternatives analyzed in the Final EIS, Broad Street would be closed between Fifth Avenue N. and Ninth Avenue N. so that the street grid could be reconnected. Mercer Street would continue to cross under SR 99 as it does today, but it would be widened and converted to a two-way street with three lanes in each direction and a center turn lane. Please see Appendix C, Transportation Discipline Report, of the Final EIS for a discussion of the transportation impacts of the three build alternatives.

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Currently, transporting hazardous materials is prohibited at all times in the Battery Street Tunnel, and during peak periods on the viaduct. This would continue to be the case with the Elevated Structure Alternative. Transporting flammable or hazardous materials would be prohibited in the tunnel for the preferred Bored Tunnel Alternative and the Cut-and-Cover Tunnel Alternative. Operators hauling these types of materials

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Street/1st Avenue S to fail. Expansion of this intersection is nearly impossible because of the location of Safeco Field and the parking garage on the opposite side of the street. In addition, eastbound traffic between the waterfront and 4th Avenue is often prohibited before and after Mariner's games. Therefore, the MIC requests that the preferred alternative maximize east-west capacity in this corridor by providing multiple connections (to both Atlantic Street and Royal Brougham Way), and by not precluding an eventual one-way couplet as originally proposed for this corridor.

Construction Impacts

Most of the negative impacts of the Viaduct project relate to road closures or delays during construction. Construction impacts would severely affect businesses in BINMIC because they frequently use this corridor. Construction impacts throughout the Duwamish would primarily be related to additional traffic congestion along parallel routes caused by construction closures or delays.

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10. **Long-term closure of the Viaduct during construction is unacceptable.** Although not discussed in the DEIS, we understand that some review is proceeding related to long-term closure of the Viaduct to speed up the construction process. Most of our constituent industrial businesses plan in a 10-year horizon. If the Viaduct were to be closed for long periods of time, some businesses may opt to relocate or expand outside of the Seattle area. Seattle may never recover from the loss of these businesses. Therefore, the preferred alternative must be constructed in a way that minimizes closure of the Viaduct. If the Viaduct or its access ramps must be eliminated for periods longer than 3 months, then suitable detour routes that provide nearly equivalent travel time from freight movements must be provided. Although closing the Viaduct may reduce the overall cost of the project, the economic impact to businesses in Seattle should be considered when selecting a Preferred Alternative.
11. **The FEIS must thoroughly evaluate truck detours and alternative routes during construction.** Based on the DEIS, construction of three of the alternatives would close the Elliott Avenue/Western Avenue ramps to the SR-99 corridor for between 24 months and 114 months. However, the detour routes discussed in the DEIS are unacceptable to BINMIC, and few alternatives exist. For example, the detour route for trucks along Alaskan Way would have only one lane in each direction; Interstate 5 is already heavily congested for much of the day; and trucks larger than 27 feet are currently prohibited from Downtown Seattle streets north of King Street between 6:00 A.M. and 6:00 P.M. Therefore, it is imperative that alternative truck routes that provide nearly equivalent travel time to the BINMIC be provided if the Elliott/Western Avenue ramps are closed for long periods of time.
12. **Construction planning must more thoroughly coordinate with other major projects, not just the Monorail project.** Page 291 of the Transportation Discipline Report notes that the Seattle monorail project is not expected to be complete until 2009 and the viaduct construction could begin in 2008. During 2008 and 2009 "there could be a short period where there are possible conflicts with project traffic detour plans and other construction processes." There could be a plethora of other transportation construction projects occurring during this period including projects on Interstate 5, City of Seattle streets, Sound Transit light rail or commuter rail lines, and the Washington State Ferries terminals. Detailed planning among all potential stakeholders should be evaluated during subsequent phases of project development to identify conflicts among all construction projects and identify appropriate mitigation strategies.
13. **Adequate funding for temporary traffic control and police officer control must be included in the construction budgets.** The Seattle Police Department provides the most effective temporary traffic control when manned flaggers are required. The efficiency of this traffic control increases if the same personnel can be used every day because they become familiar with traffic flow and the influence of upstream or downstream intersection operations. Recent budget cuts and/or the effect of multiple construction projects in Seattle may affect the quality of traffic control that can be provided during

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would need to use I-5 or Alaskan Way.

The project team is committed to working with the freight community and the City to define alternative routes and appropriate mitigation for the construction period. These are addressed in Appendix C, Transportation Discipline Report, of the Final EIS. Mitigation measures are described in Chapter 8 of the Final EIS.

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Please see Chapter 3 of the Final EIS for a description of the three build alternatives analyzed and the configuration of the on- and off-ramps in this area. Work on the SR 519 Project is complete. The SR 519 Project improved connections for traffic heading to the Port of Seattle terminals, Colman Dock ferry terminal, central waterfront area, sports stadiums, and destinations in Seattle's SODO neighborhood. SR 519 improvements separate car, freight, pedestrian, and rail traffic to help improve mobility and pedestrian safety and reduce the risk of collisions. All major work was completed before the start of construction to replace the Alaskan Way Viaduct between S. Holgate and S. King Streets.

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The 2004 Draft EIS evaluated one construction plan that considered brief closures of SR 99 during construction, but otherwise assumed that at least two lanes would be provided in each direction on SR 99 or an alternate detour route. In comments received on the 2004 Draft EIS, many people asked the lead agencies to consider more than one construction plan. Specifically, many people wanted to know if closing the corridor would reduce the amount of time it takes to build the project. To respond to this question, three different construction plans were developed (a shorter construction plan, an intermediate construction plan, and a longer construction plan) and evaluated in the 2006 Supplemental Draft EIS. Since 2006, the Cut-and-Cover Tunnel and

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construction. Adequate budget should be included in the project to fund trained police staff for these traffic control functions.

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14. The FEIS should document impacts to other east-west corridors in Seattle, particularly during construction. The DEIS does not adequately document the potential impacts to major east-west arterial routes throughout Seattle for each alternative nor during construction. The DEIS does disclose that the potential loss in capacity, change in access points, and added travel time along the SR-99 corridor will shift trips (including truck trips from the BINMIC areas) toward the east onto Interstate 5 or other north-south Seattle arterials. The Final EIS should document the impacts of these potential shifts on the major east-west arterial routes such as Spokane Street, Lander Street, SR-519, Mercer/Roy Corridor, Nickerson Street, Leary Way, and N 39th Street. It should also identify mitigation to accommodate these impacts.

Flexible Transportation Package

C-010-011

15. We understand that freight-related items may be included in the Flexible Transportation Package that would be implemented during construction to relieve congestion. Freight-related items that may be appropriate for this package include:
- Do not restrict the hours in which freight can move through the system. The logistical constraints with coordinating all deliveries, loading, and unloading only during nighttime hours simply make this ineffective and often not feasible.
 - Radio alerts and e-mail dispatches related to construction delays, lane closures, and alternative routes.
 - Designated truck routes or lanes along roadways with acceptable grades, intersection turn radii, and clearance (lateral and vertical). The truck routes should include both north-south alternatives and east-west routes. Improvements may be required in some locations to provide lateral or vertical clearance.
 - Designated truck routes for flammable, hazardous, and combustible materials during times when the viaduct and/or surface Alaskan Way are not available.
 - Alternate over-dimension routes during times when surface Alaskan Way is not available.
 - All project construction detours and truck route planning should consider other construction projects throughout Seattle. Projects along I-5, on City streets, at the Ferry Terminals, and on other major state routes should be coordinated with the viaduct construction and communication plan.

Sincerely,



Dave Gering, Executive Director
Manufacturing Industrial Council of Seattle

Elevated Structure Alternatives and the construction approach for each of the alternatives have been refined. One construction plan is analyzed for each of the alternatives (Bored Tunnel, Cut-and-Cover Tunnel, and Elevated Structure) in the Final EIS. Chapter 3 describes each alternative and its construction plan, and Chapter 6 describes construction effects.

Chapter 8 of the Final EIS and Appendix C, Transportation Discipline Report, provide information on construction haul routes and also describe the temporary construction effects and mitigation for traffic. The City of Seattle will likely not allow haul routes on streets where pavement conditions could not sustain the heavier loads and trip frequencies. Access to and from SR 99 would be provided by new ramps near the stadiums and near Seattle Center. If the Bored Tunnel Alternative is selected, the City of Seattle would construct a new road between Alaskan Way and the Elliott/Western corridor.

Chapter 6 of the Final EIS discusses other major construction projects in the downtown area that may overlap with the Alaskan Way Viaduct construction schedule. Since the Draft EIS was published in 2004, the Seattle Monorail Project has been cancelled and the Seattle Ferry Terminal Project has been delayed. The Alaskan Way Viaduct Replacement Project will continue to coordinate with the other major construction projects in the area.

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Project cost estimates include funding for police and other traffic control measures during construction.

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The Final EIS evaluates shifts in traffic and impacts to major east-west streets. Specific traffic impacts on major east-west corridors during the construction phase are documented in the Final EIS Appendix C,

Transportation Discipline Report. The evaluation of construction traffic impacts defines and identifies traffic impacts in the downtown core and in neighboring areas such as Pioneer Square, Belltown, and the Stadium district. The analysis targets alternative north-south routes to the Alaskan Way Viaduct (including First Avenue, Second Avenue, etc.), as well as key east-west arterials in and around downtown.

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Thank you for your comment regarding the Flexible Transportation Package (FTP). Since the Draft EIS was published in 2004, the FTP has been further developed as part of the project's construction transportation planning process (though the name FTP is no longer being used). The Final EIS details a proposed set of actions aimed at managing mobility and reducing travel impacts associated with construction of the Alaskan Way Viaduct Replacement Project. These actions are intended to help transit operate efficiently given increased general-purpose traffic in the downtown Seattle area during construction. These actions should improve transit access through downtown Seattle and minimize the effect of peak period traffic congestion for transit passengers and operators.